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Hearing Date: August 10, 2022, 10:00 am
Opposition Deadline: July 22, 2022
Reply Deadline: August 5, 2022

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

SQUARE ONE FUND LTD.,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04330 (CGM)

**NOTICE OF MOTION FOR ORDER ISSUING LETTER OF REQUEST
FOR THE EXAMINATION OF TIMOTHÉE HENRY**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 1781 and this Court’s inherent authority, and in light of the comity between the United States and Switzerland and upon the accompanying Motion for an Order Issuing a Letter of Request (the “Motion”), Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, substantively consolidated with the Chapter 7 estate of Bernard L. Madoff, through his undersigned counsel, will move before The Honorable Cecelia G. Morris, United States Bankruptcy Court for the Southern District of New York, on **August 10, 2022 at 10:00 am**, or as soon as counsel may be heard, seeking entry of an Order Issuing a Letter of Request for Service Abroad of Judicial or Extrajudicial Documents in Civil or Commercial Matters (the “Order”).

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing on the Motion must refer to Judge Morris’s guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451–6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court’s website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>. Pro se parties may participate telephonically in hearings free of charge.

PLEASE TAKE FURTHER NOTICE that any objection to the Motion (“Objection”) shall: (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the Objection(s) and specific grounds therefor; (iv) be filed in accordance

with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service; (v) be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Ganesh Krishna, Esq.; and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq., so as to be received no later than **July 22, 2022**.

PLEASE TAKE FURTHER NOTICE that failure to timely file an Objection may result in the entry of an order granting the relief requested in the Motion without further notice to any party or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that the Trustee shall file a reply, if any, by no later than **August 5, 2022**.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

The Trustee made no prior request to this Court or to any other court for the relief requested by the Motion.

Dated: July 12, 2022
New York, New York

Respectfully submitted,

/s/ Marco Molina
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